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February 21, 2025

Via ECF

The Honorable Karoline Mehalchick  
William J. Nealon Federal Bldg. & U.S. Courthouse  
235 N. Washington Avenue  
Scranton, PA 18503

**RE: Carter, Shakiyla (Estate of R. Carter) v. Dauphin County et al.**  
**Docket No. 1:23-cv-1867**  
**Claim No. 2890000497**  
**Our File No.403-8661**

Dear Judge Mehalchick:

We represent the Dauphin County Defendants in this matter.

Your Honor has set a discovery phone conference for February 26, 2025, at 10:30 AM. At that time, I will be flying to Texas for a conference. Andrew Norfleet, who is also counsel of record in this case with me for the clients, is out of town on another matter during this time as well.

Accordingly, we would request a short postponement of the hearing until early next week. I have spoken to Christopher Markos, the attorney for the Plaintiff, and John Ninosky, the attorney for PrimeCare Medical, Inc., and they did not oppose this request. All parties are available on Monday, March 3, 2025, on Tuesday, March 4, 2025 before 3:00 PM, and all day on Wednesday, March 5, 2025. Your kind consideration of this request is greatly appreciated.

Very truly yours,

*s/ Frank J. Lavery, Jr.*

Frank J. Lavery, Jr., Esquire

FJL/lmh

cc: Christopher Markos, Esquire (via ECF)  
John Ninosky, Esquire (via ECF)